

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Jesus Jose Palmeroni, A/K/A Joseph Palmeroni,
D/B/A, JJP Consulting, LLC

Debtor(s).

N.V.E., Inc.

Movant

v.

Jesus Jose Palmeroni, A/K/A Joseph Palmeroni,
D/B/A, JJP Consulting, LLC

Civil Action No. 5:16-BK-3073-JJT

**NOTICE OF MOTION
FOR EXAMINATION AND
PRODUCTION OF DOCUMENTS
UNDER FED. R. BANKR. P. 2004**

Date and Time of Hearing:

June 1, 2017 at 9:30 A.M.

Place of hearing:

**274 Max Rosenn U.S. Courthouse
197 South Main Street, Courtroom 2
Wilkes-Barre, PA 18701**

N.V.E., Inc. ("NVE") by and through its undersigned attorneys, hereby moves for authority to examine Debtor Jesus Palmeroni ("Debtor"), individually and as the officer/director/principal/owner/member of JJP Consulting, L.L.C.; National Retail Consulting Group Inc.; Smart World Inc.; American Wholesale Distribution Inc., Global Marketing & Sales Group, LLC and One World Bank pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, on the following grounds:

1. On July 27, 2016, Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code.

2. NVE is an unsecured secured creditor of the Debtor.

3. In order to obtain information about the assets and liabilities of Debtor, NVE seeks to examine Debtor under Fed. R. Bankr. P. 2004.

4. Debtor has information and documents relating to his acts, conduct and property, as well as his liabilities, financial condition and matters concerning the administration of the estate.

5. NVE also requests an examination of Debtor to determine the continued operations and financial condition of the following entities in which Debtor has held an ownership interest: JJP Consulting, LLC; National Retail Consulting Group Inc.; Smart World Inc.; American Wholesale Distribution Inc.; and Global Marketing & Sales Group, LLC and One World Bank.

6. NVE also requests an examination to ascertain the source of any money or property acquired or to be acquired by Debtor for purposes of formulation and consummation of any proposed plan, and the consideration offered therefor, and any other matters relevant to administration of the Debtor's estate.

WHEREFORE, NVE respectfully request this Court to enter an Order:

(i) Directing Debtor to submit to an examination under Fed. R. Bankr. P. 2004 by NVE its undersigned counsel, on June 8, commencing at 9:00 A.M. at the office of NVE's undersigned counsel;

(ii) Ordering Debtor to produce for inspection and copying by NVE all of the documents described in the attached Exhibit A by June 5, 2017;

(ii) Granting NVE such other and further relief as is just and proper.

Respectfully submitted,

/s/ Samuel S. Samaro

SAMUEL J. SAMARO

Pashman Stein Walder Hayden, P.C.

Court Plaza South, Suite 200

21 Main Street

Hackensack, New Jersey 07601

Telephone: 201-488-8200

Facsimile: 201-488-5556

ssamaro@pashmanstein.com

Attorneys for Movant N.V.E., Inc.

EXHIBIT A

- Debtor's federal and state tax returns, including all schedules and worksheets, for 2014, 2015 and 2016;
- Any documents relating to state or federal tax liens concerning Debtor and/or his property in the past three (3) years;
- Any documents relating to Debtor's financial accounts, including any checking accounts, savings accounts, money market accounts, brokerage accounts, cash management accounts, retirement accounts, credit card accounts or investment accounts, in the past three (3) years;
- Any documents relating to income that Debtor has received in the past three (3) years including, but not limited to, forms W-2, 1099, K-1, etc.;
- Any documents relating to any income or "comps" that Debtor has received from gambling activity in the past three (3) years;
- Any documents relating to gifts over \$100 that Debtor has made or received in the past three (3) years;
- Any documents relating to trusts that Debtor has established, funded, or settled in the past ten (10) years;
- Any documents relating to real property owned by Debtor in the past three (3) years;
- Any documents relating to vehicles, including automobiles, boats, etc., that Debtor has owned or leased in the past three (3) years;
- Any documents relating to Debtor's ownership interest in One World Bank;
- Any documents relating to One World Bank's financial condition in the past three (3) years including but not limited to profit and loss statements; accounting records, bank statements, copies of checks, contracts, accounts receivable, and property owned by the company; ;
- Any documents relating to JJP Consulting, LLC's financial condition in the past three (3) years, including but not limited to profit and loss statements; accounting records, bank statements, copies of checks, contracts, accounts receivable, and property owned by the company;
- Any documents relating to American Wholesale Distribution Inc.'s financial condition in the past three (3) years including, but not limited to, profit and loss statements; accounting records, bank statements, copies of checks, contracts, accounts receivable, and property owned by the company;

- Any documents relating to Smart World Inc.'s financial condition in the past three (3) years including, but not limited to, profit and loss statements; accounting records, bank statements, copies of checks, contracts, accounts receivable, and property owned by the company;
- Any documents relating to Global Marketing & Sales Group, LLC's financial condition in the past three (3) years, including but not limited to profit and loss statements; accounting records, bank statements, copies of checks, contracts, accounts receivable, and property owned by the company;
- Any documents relating to money or property transferred to Michele Hooey in the past three (3) years;
- Any documents relating to money or property transferred to a trust, 529 account, or similar financial account for the benefit of Lincoln Palmeroni in the past three (3) years;
- Any documents relating to money or property transferred to Maria Palmeroni in the past three (3) years;
- Any documents relating to money or property transferred to MaryAnn's Dairy Bar in the past three (3) years;
- Any documents relating to Debtor's \$100,000 loan to Roland Bossi;
- Any documents relating to mortgages that Robert Vort provided to Debtor;
- Any documents relating to funds that Robert Vort is holding for Debtor in his attorney trust account;
- Any documents relating to the mortgage that Maria Palmeroni provided to Debtor;
- Any documents relating to property leased or rented by Debtor in the past three (3) years; and
- Any documents relating to rental income Debtor has received in the past three (3) years.